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May 30, 2019

Magistrate Judge Steven M. Gold  
United States District Court  
Eastern District of New York  
225 Cadman Plaza E.  
Brooklyn, New York 11201

**Re: Shin, Edward v. YS2 Enterprises, Inc., et al**  
**Case No: CV-17-5183 (ILG) (SMG)**  
**Our File No.: 10258.0063841**

Dear Hon. Gold:

This firm represents defendants, Michel S. Wang, Richardson Irrevocable Trust, Terrance Wu, and De-Jung Deborah Wang, (collectively “Wang defendants”), in the above referenced action.

We write to request an extension of time to produce Mr. Michel Wang, who is expected to testify on behalf of the Wang Defendants. Currently, the deadline to produce Mr. Wang is set for June 3<sup>rd</sup>. However, Mr. Wang was out of the country for a good part of May and, although he has since returned, the parties’ respective schedules make it difficult to schedule his deposition by the June 3<sup>rd</sup> deadline. We request a 30 day extension to produce Mr. Wang, who is expected to testify on behalf of the owners. Please note that Mr. Wang is the last remaining party witness to be deposed. Also, nonparty witnesses, Mr. John Kim, Mr. David Park, and Mr. Chung Lee have been deposed.

In addition, yesterday Mr. Shin was arrested and charged with various Federal crimes in connection with loans given by Noah Bank to small businesses. We conferred with Mr. Basil, who was aware of the arrest, and is requesting additional time to produce his client for a further deposition stemming from his recent surgery, as well as an extension of time for expert discovery. Mr. Basil is also requesting 30 days for both.

The parties do not object to the extension of time.

Thank you for your consideration.

Very truly yours,

**CHARTWELL LAW**

**/s/ Carmen A. Nicolaou**

By: \_\_\_\_\_  
Carmen A. Nicolaou

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